

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KALOMA CARDWELL,

Plaintiff,

v.

DAVIS POLK & WARDWELL LLP,
THOMAS REID, JOHN BICK, WILLIAM
CHUDD, SOPHIA HUDSON, HAROLD
BIRNBAUM, DANIEL BRASS, BRIAN
WOLFE, and JOHN BUTLER,

Defendants.

19 Civ. 10256 (GHW)

**NOTICE OF DEFENDANTS'
MOTION FOR ATTORNEYS' FEES AND COSTS**

Please take notice that defendants Davis Polk & Wardwell LLP, John Bick, Harold Birnbaum, Daniel Brass, John Butler, William Chudd, Sophia Hudson, Thomas Reid, and Brian Wolfe will move before the Honorable Gregory H. Woods, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an order pursuant to Federal Rule of Civil Procedure 37 awarding fees and costs.

A memorandum of law and the Declaration of Susanna Buerger support this motion and are filed contemporaneously herewith.

Dated: January 20, 2021
New York, New York

Respectfully submitted,

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

By: /s/ Bruce Birenboim

Bruce Birenboim

Jeh C. Johnson

Susanna Buerger

Marissa C.M. Doran

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